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1	JACKLIN CHOU LEM (Cal. Bar No. 255293) MAY LEE HEYE (Cal. Bar No. 209366)	
2	HOWARD J. PARKER (Wash. Bar No. 07233) KELSEY C. LINNETT (Cal. Bar No. 274547)	
3	Antitrust Division	
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7	Attorneys for the United States	
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9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	SAN FRANCISCO DIVISION	
12	UNITED STATES OF AMERICA) No. CR 11-0599 RS	
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14	v. STIPULATION AND [PROPOSED] ORDER FOR	
15	EXPEDITED SENTENCING	
16	SABRY LEE (U.S.A.), INC., UNDER L.R. 32-1(b)	
17	Defendant.) DATE: September 20, 2011) TIME: 2:30 pm	
18	OURT: Hon. Richard Seeborg	
19		
20	On August 30, 2011, the United States filed a one-count Information charging defendant	
21	Sabry Lee (U.S.A), Inc. ("Sabry Lee") with participating in a conspiracy to suppress and	
22	eliminate competition by fixing the prices of aftermarket auto lights sold in the United States and	
23	elsewhere, in violation of the Sherman Antitrust Act, 15 U.S.C. § 1. Sabry Lee is scheduled for a	
24	change of plea and possible sentencing on September 20, 2011. Sabry Lee will waive Indictment	
25	and plead guilty under Fed. R. Crim. P. 11(c)(1)(C). The United States and Sabry Lee have filed	
26	a Joint Sentencing Memorandum describing the material terms of the plea agreement and the	
27	agreed-upon recommended sentence. The Plea Agreement has been attached as Exhibit A to the	
28	Joint Sentencing Memorandum. The United States has also filed under seal the Declaration of	
	-1-	
	STIPULATION AND [PROPOSED] ORDER	

STIPULATION AND [PROPOSED] ORDER FOR EXPEDITED SENTENCING, CR 11-0599 RS

1	Jacklin Chou Lem in Support of United States' and Defendant Sabry Lee's Joint Sentencing
2	Memorandum ("Lem Declaration").
3	IT IS HEREBY STIPULATED AND AGREED as follows:
4	The United States and Sabry Lee request that the Court sentence Sabry Lee on an
5	expedited basis pursuant to Crim. L.R. 32-1(b) on September 20, 2011, the same date as the
6	scheduled change of plea hearing. The United States and Sabry Lee respectfully submit that the
7	Joint Sentencing Memorandum, the Lem Declaration, and the Plea Agreement provide sufficient
8	information for the Court to exercise its sentencing authority meaningfully without a presentence
9	report,
10	
11	Dated: Sept. 6, 2011
12	Respectfully submitted,
13 14 15 16 17 18 19 20 21 22	Brian J. Hynnigan Irell & Manella LLP I800 Avenue of the Stars Suite 900 Los Angeles, CA 90067-4267 Counsel for Sabry Lee (U.S.A.), Inc. Jacklin Chou Lem May Lee Heye Howard J. Parker Kelsey C. Linnett Trial Attorneys U.S. Department of Justice Antitrust Division 450 Golden Gate Avenue Box 36046, Room 10-0101 San Francisco, CA 94102 Antitrust Division (415) 436-6660
24	Based on the stipulation of the parties, and for good cause shown,
25	IT IS SO ORDERED.
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27	Dated: 9/7 , 2011
28	Honorable Richard Seeborg United States District Court Judge
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-2-

STIPULATION AND [PROPOSED] ORDER FOR EXPEDITED SENTENCING, CR 11-0599 RS